

**UNITED STATES DISTRICT COURT
DISTRICT OF NEBRASKA**

ANDREA GROVE and
CHRYSTINA WINCHELL,
individually and on behalf
of similarly situated individuals,

Plaintiffs,

v.

MELTECH, INC.,
H&S CLUB OMAHA, INC.,
SHANE HARRINGTON, and
BRAD CONTRERAS,

Defendants.

NO. 8:20-CV-00193-JFB-MDN

**PLAINTIFFS' UNOPPOSED MOTION
FOR APPROVAL OF FLSA SETTLEMENT**

Plaintiffs Andrea Grove and Chrystina Winchell ("Plaintiffs") hereby respectfully requests the Court's approval of the FLSA settlement reached by the Plaintiffs and Defendants Meltech, Inc., H&S Club Omaha, Inc., Shane Harrington and Brad Contreras ("Defendants"). This Settlement resolves the claims of the Plaintiffs and opt-ins under the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.* ("FLSA") and the Nebraska Wage and Hour Act ("NWAHA") for a total of \$150,000.00, and is the result of two settlement conferences before Magistrate Judge Nelson. As detailed in the accompanying Memorandum of Law, this proposed resolution of the Plaintiff and opt-ins' claims is fair and reasonable and warrants judicial approval.

Because the Settlement reached by the Parties is fair and reasonable, Plaintiffs respectfully request that the Court issue an order: 1) granting approval of the proposed Settlement Agreement; 2) approving a service award of \$2,000 to Plaintiff Grove and \$3,000 to

Plaintiff Winchell, and 3) approving the award of attorneys' fees and costs in the amount of \$50,000.00.

DATED: November 4, 2021

Respectfully submitted,

ANDREA GROVE, and
CHRYSTINA WINCHELL,
on behalf of themselves
and all others similarly situated,

By their attorneys,

/s/ Olena Savytska

Harold Lichten
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CERTIFICATE OF SERVICE

I hereby certify that on this 4 day of November, 2021, a copy of the foregoing document was filed electronically through the Court's CM/ECF system, which will send notice of this filing to all counsel of record.

/s/ Olena Savytska

Olena Savytska, Esq.